



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

September 4, 2013

Notice of Issuance of a Limited Environmental Review and Final Finding of No Significant Impact to All Interested Citizens, Organizations, and Government Agencies

Cuyahoga County, Broadview Drill Drop and Sanitary Sewer

WPCLF #: CS390018-0039

The purpose of this notice is to advise the public that Ohio EPA has reviewed the referenced project and finds neither an Environmental Assessment (EA) nor a Supplemental Study (SS) is required to implement the project as discussed in the attached Limited Environmental Review (LER). Therefore, a Finding of No Significant Impact is being issued for this project.

The Water Pollution Control Loan Fund program requires the inclusion of environmental factors in the decision-making process for project approval. Ohio EPA has done this by incorporating a detailed analysis of the environmental effects of the proposed action in its review and approval process. Environmental information was developed as part of the facilities plan, as well as through the facilities plan review process. A subsequent review by this Agency has found that the proposed action does not require the preparation of either an EA or an SS.

Our environmental review concluded that because the proposed project is limited in scope and meets all applicable criteria, a Limited Environmental Review is warranted. Specifically, the proposed sanitary sewer connection to the existing deep tunnel sewer is a *minor upgrading* that qualifies for a LER and meets the following additional criteria for a LER:

The proposed project:

- has no significant environmental effect;
- does not require extensive specific impact mitigation;
- has no effect on high value environmental resources;
- is cost effective;
- is not a controversial action;
- does not create a new, or relocate an existing discharge to surface or ground waters;
- will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and
- will not provide capacity to serve a population substantially greater than the existing population.

The LER presents additional information on the proposed project, costs, and basis for our decision. Further information can be obtained by calling or writing the contact person named at the end of the LER.

Upon issuance of this determination, loan award may proceed without being subject to further environmental review or public comment, unless information is provided which determines that environmental conditions on the proposed project have changed significantly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alauddin A. Alauddin", with a stylized flourish at the end.

Alauddin A. Alauddin, Chief
Division of Environmental and Financial Assistance

c: Sue Farmer, OWDA
File (2)

LIMITED ENVIRONMENTAL REVIEW

A. Project Identification

Name: Cuyahoga County, Broadview Drill Drop and Sanitary Sewer

Address: Bonita G. Teeuwen, P.E.
Cuyahoga County Department of Public Works
2100 Superior Viaduct
Cleveland, OH 44113

WPCLF #: CS390018-0039

B. History and Existing Conditions

The Cuyahoga County Department of Public Works has requested \$285,000 from the Ohio Water Pollution Control Loan Fund (WPCLF) to construct a sewer connection to a Northeast Ohio Regional Sewer District (NEORS) deep tunnel sewer in anticipation of planned sanitary connections in an area of the City of Parma served by household septic systems.

Cuyahoga County's operation and management of the sanitary sewers in many communities provides an economy of scale that allows less expensive service than each community could provide independently. The service agreements allow for the financing of the project with present cash balances.

Many of the aged septic systems in the greater project area (the West Creek watershed) are failing and pollute area streams. A 1999 Cuyahoga County Board of Health study showed fecal coliform counts exceeding the recreational water contact standard of 1,000 colonies per 100 milliliters of water in 15 of 20 sites on West Creek tested, representing a serious threat to local water quality. Elimination of septic systems in the greater project area first requires gravity sewer access to the existing deep tunnel sewer. All work will be in and beneath a major thoroughfare, land lacking important environmental resources.

C. Project Description

To prepare for the City of Parma's elimination of failing septic systems by constructing conventional gravity sewers, Cuyahoga County will construct a drop connection to the existing NEORS deep tunnel sanitary sewer on Broadview Road just north of West Creek, and approximately 100 linear feet of 10-inch diameter sanitary sewer across Broadview Road (Figure 1). The new sewer will dead-end in a new manhole on the east side of Broadview Road, to which the anticipated gravity sewers will connect. The drop connection to the deep tunnel sewer will be in a new manhole, and a third manhole along the new sewer in Broadview Road will connect an existing 8-inch diameter sewer to the new sewer.

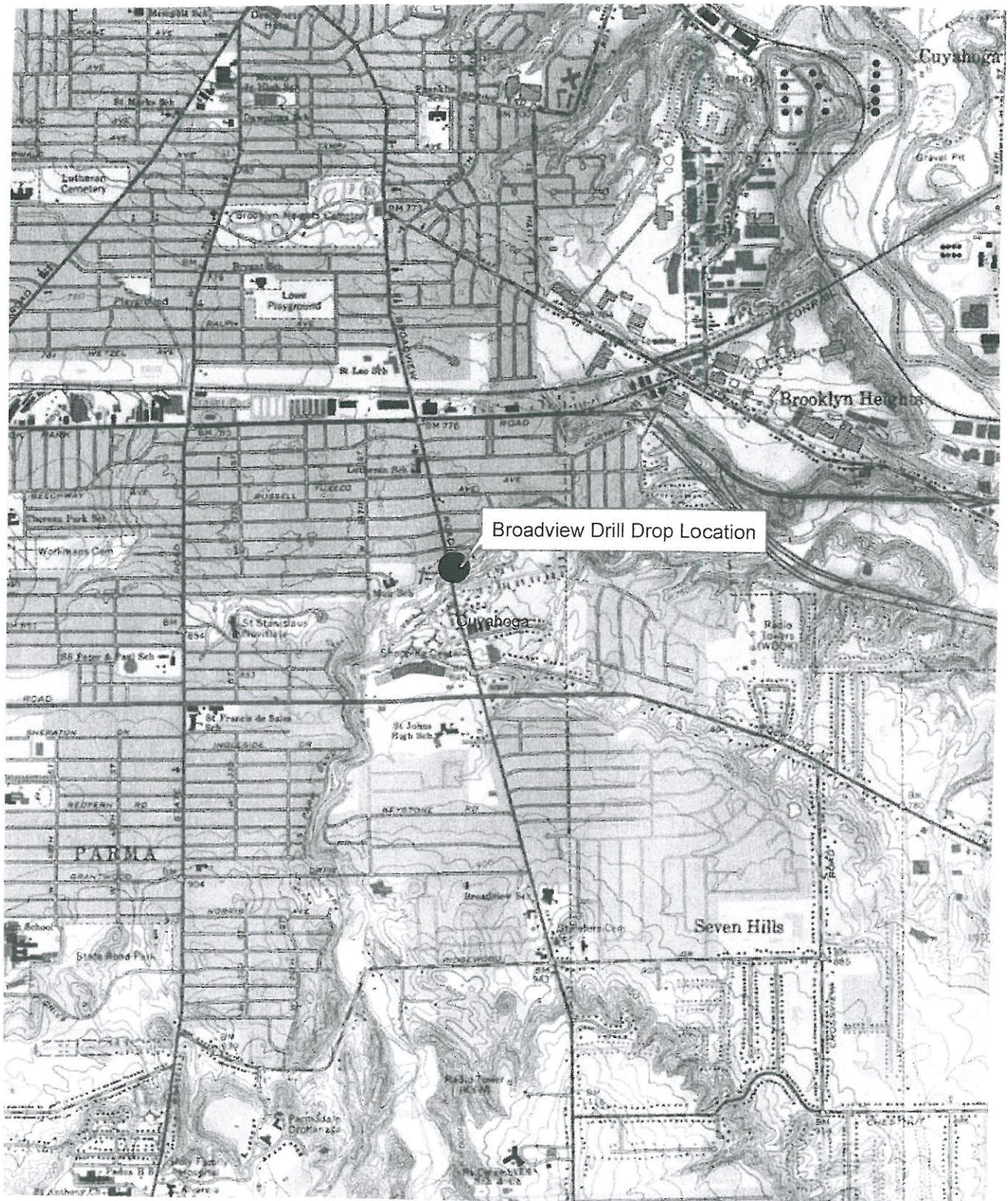


Figure 1 - Project Location

D. Estimated Project Costs

Cuyahoga County will borrow approximately \$285,000 from the WPCLF at the standard interest rate (now 3.39%; the rate is set monthly and may change for an October or later award). During the 20-year loan period, Cuyahoga County will save approximately \$59,000 by using WPCLF dollars at this rate, compared to the market rate of 4.42%.

E. Project Schedule

Construction will start after expected loan award in October 2013 and be completed within four months.

F. Public Notification

Cuyahoga County and Parma posted a project description with request for public comment on their respective web pages in early 2013 and received no responses.

Ohio EPA is unaware of any controversy about or opposition to the project.

Ohio EPA is posting this Limited Environmental Review (LER) decision and Finding of No Significant Impact on the Division of Environmental and Financial Assistance webpage and Cuyahoga County and the City of Parma are posting this on their web pages. Information supporting the LER is available from the project contact named below.

G. Planning Information

The proposed project was reviewed by the Ohio Historic Preservation Office and Ohio EPA. No review agency opposes the project.

H. Conclusion

The proposed sanitary sewer connection to the existing deep tunnel sewer is a minor upgrading that qualifies for a LER and meets the following additional criteria for a LER:

It has no significant environmental effect; has no effect on high value environmental resources; and does not require extensive specific impact mitigation – All construction of the proposed drill drop connection and associated piping is beneath and immediately adjacent to Broadview Road, an area lacking important or sensitive environmental or cultural features. Construction impacts should be limited to traffic disruption, which will be minimized by standard construction traffic controls, and potential runoff of excavated soils, which will be controlled by standard construction erosion and sediment controls.

It is cost effective and not controversial – This project will allow for low-cost ongoing service and future installation of low-maintenance gravity sewers to eliminate nearby failing septic systems. This project requires no rate increase and the debt service for

the WPCLF loan will come from cash balances in the City of Parma account with Cuyahoga County. The typical annual residential sanitary sewer bill in Parma is \$827 (including sewage treatment billed by the Northeast Ohio Regional Sewer District and the county fee for sewer operation and maintenance), which is approximately 1.4% of median household income (MHI; \$48,950). Sewer bills below 1.8% of MHI are generally considered affordable. The Ohio average sewer bill, \$557 (2011 Water and Sewer Rate Survey), is 1.1% of MHI.

It does not create a new, or relocate an existing, discharge to surface or ground waters; will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and will not provide capacity to serve a population substantially greater than the existing population – This project will only allow for additional sewer customers and sanitary flows already accounted for in the areawide sewer service plan. The connection to the existing deep tunnel sewer involves no addition of capacity and will not alter discharge volumes or locations.

The planning activities for the project have identified no potentially significant adverse impacts. The project is expected to have no significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources (floodplains, wetlands, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species).

I. For more information, please contact:

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